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Attorneys for Defendant  
William H. Howard

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

DAVID BEASLEY

Plaintiff,

vs.

WILLIAM H. HOWARD

Defendant.

CASE NO. 1:19-cv-11058-JBS

**DECLARATION OF MOSHE D.  
LAPIN IN SUPPORT OF  
APPLICATION FOR ADMISSION  
PRO HAC VICE**

I, **MOSHE D. LAPIN**, declare, under penalty of perjury, as follows:

1. I am an attorney-at-law and the principal of the Lapin Law Firm. I respectfully submit this Declaration in support of my application for admission *pro hac vice* pursuant to Local Civil Rule 101.1(c).

2. I am a member in good standing of the Bars of the State of California, the State of Maryland, the State of New York, the United States Virgin Islands, the United States District Court for the Central District of California, and the United States Court of Appeals for the Seventh Circuit. I have never been subjected to any discipline by any court or governing body.

3. I was admitted to the Bar of the State of California in 2017. Member Services of the State Bar of California, located at 180 Howard Street, San Francisco, California 94105, maintains the roll of all members of the Bar of the State of California.

4. I was admitted to the Bar of the State of Maryland in 2007. The Maryland Court of Appeals Clerk's Office, 361 Rowe Blvd., Annapolis, MD 21401, maintains the roll of all members of the Bar of the State of Maryland.

5. I was admitted to the Bar of the State of New York in 2008. The New York State Supreme Court - Appellate Division - 3rd Department, Robert Abrams Building for Law and Justice State Street, Room 511 Albany, New York 12223, maintains the roll of all members of the Bar of the State of New York admitted through the 3<sup>rd</sup> Department.

6. I was admitted to the Bar of the United State Virgin Islands in 2013. The Clerk of the Supreme Court of the Virgin Islands, 161B Crown Bay St.

Thomas, VI 00802, maintains the roll of all members of the Bar of the Virgin Islands.

7. I was admitted to the Bar of the United States District Court for the Central District of California in 2019. The Admissions Clerk at the United States District Court for the Central District of California, 255 East Temple Street Los Angeles, CA 90012, maintains the roll of all members of the Bar for the court.

8. I was admitted to the Bar of the United States Seventh Circuit Court of Appeals in 2017. The Admissions Clerk at the United States Seventh Circuit Court of Appeals, 219 S Dearborn St, Chicago, IL 60604, maintains the roll of all members of the Bar for the court.

9. I agree to submit to the jurisdiction of this Court and comply with all its rules and procedures. To ensure my familiarity with these regulations, I have reviewed the local rules of this Court.

10. I have never been convicted of a felony crime, censured, suspended, disciplined or disbarred by any court, nor are there any disciplinary or contempt proceedings involving me pending before any court, nor have I been denied admission to any court.

11. I agree to abide by the ethical standards governing practice of law in this Court pursuant to New Jersey State Lawyer's Code of Professional Responsibility.

12. I agree to abide by Local Civil Rule 101.1(c).

13. Pursuant to rules of this Court, Frank A. Natoli or another attorney in good standing of the bar of the State of New Jersey and the United States District Court for the District of New Jersey who has made an appearance for Defendant, will sign all pleadings submitted on behalf of Defendant in this litigation and will be present for all appearances before the Court unless previously excused from appearing by the Court.

14. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial or other proceedings. I further agree to submit to the jurisdiction of this Court for purposes of sanctions, discipline, or other such action as the Court may deem proper.

15. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay the annual fee required by the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2.

16. Pursuant to Local Civil Rule 101.1(c)(3), I agree to pay the required fee to the Clerk of the United States District Court for the District of New Jersey.

17. In light of the foregoing, I respectfully request on behalf of the Defendant that I be admitted *pro hac vice* for the purpose of representing him in this matter in association with New Jersey counsel. I agree to be bound by the rules governing practice in New Jersey Courts, including the disciplinary rules.

I declare under penalty of perjury that the foregoing is true and accurate.

Respectfully submitted,

Dated: June 7, 2019



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